

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

LEONA MEZA,

Plaintiff,

vs.

EQUITY INSURANCE COMPANY,

Defendant.

Case No. CIV-14-84-C

OK State Case No. CJ-14-149
(Oklahoma County)

NOTICE OF REMOVAL OF CIVIL ACTION

Pursuant to 28 U.S.C. § 1441(b), Defendant Equity Insurance Company hereby removes this case from the District Court of Oklahoma County, State of Oklahoma, to the United States District Court for the Western District of Oklahoma, on grounds that this Court has jurisdiction pursuant to 28 U.S.C. § 1332, as the parties properly joined in this case are completely diverse and the amount in controversy is in excess of \$75,000.00.

A copy of the state court docket sheet is attached hereto as Exhibit "1." A file-stamped copy of the Petition is attached hereto as Exhibit "2" and is incorporated herein by reference. A file-stamped copy of the Summons is attached hereto as Exhibit "3" and is incorporated herein by reference. A file-stamped copy of the Appearance filed by Hasbrook & Hasbrook is attached hereto as Exhibit "4" and is incorporated herein by reference.

The following facts are established on the face of these documents:

1. Plaintiff's Petition was filed in the District Court of Oklahoma County on January 9, 2014 and was served on Defendant on January 16, 2014 via the Oklahoma Insurance Department.

2. That Defendant Equity Insurance Company is a foreign insurance company and is incorporated in the State of Texas.

3. That Plaintiff claims damages in excess of \$75,000.00.

Based on the foregoing, Equity Insurance Company submits that this Court has jurisdiction pursuant to 28 U.S.C. § 1332, as the parties properly joined in this case are completely diverse and the amount in controversy is in excess of \$75,000.00, such that removal is proper.

s/Ryan R. Deligans

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Attorneys for Defendant

CERTIFICATE OF SERVICE

☒ I hereby certify that on January 28, 2014, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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s/Ryan R. Deligans
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